

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION	MDL No. 2-18-mn-2873-RMG This Document Relates to: <i>City of Camden, et al. v. 3M Company,</i> Case No. 2:23-cv-03147-RMG
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SOVEREIGNS' MOTION TO INTERVENE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Arizona, California, Colorado, Connecticut, Hawaii, Maine, Maryland, Massachusetts, Minnesota, New Hampshire, New Jersey, New Mexico, New York, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, Vermont, Wisconsin, as well as the District of Columbia, Puerto Rico, and the Commonwealth of the Northern Mariana Islands (collectively, the “Sovereigns”), by and through their respective Attorneys General and/or their respective counsel, will and hereby do move this Court, for the reasons set forth in their Memorandum of Law in Support of this Motion, for leave to intervene as of right in this action pursuant to Fed. R. Civ. P. 24(a). In the alternative, the Sovereigns seek permissive intervention pursuant to Fed. R. Civ. P. 24(b).

The grounds for this motion are as follows:

1. The Sovereigns satisfy each requirement to intervene as of right under Rule 24(a)(2). The motion is timely, the Sovereigns have significant protectable interests in this action, denial of the Motion would impair the Sovereigns’ ability to protect those interests, and the Sovereigns’ interests are not adequately protected by the parties to *City of Camden, et al. v. 3M Company*, No. 2:23-cv-03147-RMG.
2. In the alternative, the Sovereigns should be granted permissive intervention pursuant to Rule 24(b) because the Motion is timely, the Sovereigns’ claims share common questions of law and fact with Plaintiffs’ claims in this action, and intervention will not result in undue delay or prejudice to the parties to *City of Camden, et al. v. 3M Company*, No. 2:23-cv-03147-RMG.

Dated: July 26, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2023, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which shall send notice to all counsel of record.

Dated: July 26, 2023

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